

## Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the *Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000*, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Part 201 – Mitigation Planning, Interim Final Rule* (the Rule), published February 26, 2002.

**SCORING SYSTEM**

**N – Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

**S – Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

**Example**

Assessing Vulnerability: Overview

**Requirement §201.6(c)(2)(ii):** [The risk assessment *shall* include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description *shall* include an overall summary of each hazard and its impact on the community.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include an <b>overall summary</b> description of the jurisdiction's <b>vulnerability</b> to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		✓
B. Does the plan address the <b>impact</b> of each hazard on the jurisdiction?	Section II, pp. 10-20	The plan does not address the impact of two of the five hazards addressed in the plan. <b>Required Revisions:</b> • Include a description of the impact of floods and earthquakes on the assets. <b>Recommended Revisions:</b> • This information can be presented in terms of dollar value or percentages of damage.	✓	
SUMMARY SCORE			✓	

Jurisdiction: **THE CONFEDERATED SALISH AND KOOTENAI TRIBES**

## Local Mitigation Plan Review and Approval Status

Jurisdiction: <b>The Confederated Salish &amp; Kootenai Tribes</b>	Title of Plan: Pre-Disaster Mitigation Plan	Date of Plan: September 2005
Local Point of Contact: Jolene Jacobson	Address: PO Box 278 Pablo, MT 59855	
Title: DES Coordinator		
Agency: CSKT		
Phone Number: 406-675-2700 ext 1123		

State Reviewer: Kent Atwood	Title: Acting SHMO	Date: December 9, 2005
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FEMA Reviewer: Wade Nofziger Ken Crawford Jennifer Fee KC Collins	Title: Mitigation Specialist Mitigation Specialist Planner Planner	Date: December 27, 2005  February 27, 2006 February 28, 2006
Date Received in FEMA Region VIII	December 12, 2005	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	March 21, 2006	

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. Flathead Indian Reservation			X	
2.				
3.				
4.				

Jurisdiction: THE CONFEDERATED SALISH AND KOOTENAI TRIBES

5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS]				
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\* Notes: Y = Participating N = Not Participating N/A = Not Mapped

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

### SCORING SYSTEM

Please check one of the following for each requirement.

**N – Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

**S – Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite(s) (Check Applicable Box)	NOT MET	MET
Adoption by the Local Governing Body: §201.6(c)(5) <b>OR</b>		X
Multi-Jurisdictional Plan Adoption: §201.6(c)(5) <b>AND</b>		N/A
Multi-Jurisdictional Planning Participation: §201.6(a)(3)		N/A
<b>Planning Process</b>	<b>N</b>	<b>S</b>
Documentation of the Planning Process: §201.6(b) and §201.6(c)(1)		X
<b>Risk Assessment</b>	<b>N</b>	<b>S</b>
Identifying Hazards: §201.6(c)(2)(i)		X
Profiling Hazards: §201.6(c)(2)(i)		X
Assessing Vulnerability: Overview: §201.6(c)(2)(ii)		X
Assessing Vulnerability: Identifying Structures: §201.6(c)(2)(ii)(A)	X	
Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B)	X	
Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C)	X	
Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii)		X

**Mitigation Strategy**

Local Hazard Mitigation Goals: §201.6(c)(3)(i)  
 Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii)  
 Implementation of Mitigation Actions: §201.6(c)(3)(iii)  
 Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv)

N	S
	X
	X
	X
	N/A

**Plan Maintenance Process**

Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i)  
 Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii)  
 Continued Public Involvement: §201.6(c)(4)(iii)

N	S
	X
	X
	X

**Additional State Requirements\***

Insert State Requirement  
 Insert State Requirement  
 Insert State Requirement

N	S

**LOCAL MITIGATION PLAN APPROVAL STATUS**

PLAN NOT APPROVED

☐

PLAN APPROVED

XXX

\*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

**See Reviewer's Comments**

## PREREQUISITE(S)

## Adoption by the Local Governing Body

**Requirement §201.6(c)(5):** [The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Has the local governing body adopted the plan?	Page 1	The tribe has adopted the plan.		X
B. Is supporting documentation, such as a resolution, included?	Page 1, Appendix A	A copy of the adoption resolution is included in the plan. Resolution 05-160 signed May 12, 2005.		X
SUMMARY SCORE				X

## Multi-Jurisdictional Plan Adoption

**Requirement §201.6(c)(5):** For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	N/A			
B. For each jurisdiction, has the local governing body adopted the plan?	N/A			
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	N/A			
SUMMARY SCORE				N/A

## Multi-Jurisdictional Planning Participation

**Requirement §201.6(a)(3):** Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the plan describe <b>how</b> each jurisdiction	N/A			

participated in the plan's development?				
SUMMARY SCORE				N/A

PLANNING PROCESS: §201.6(b): *An open public involvement process is essential to the development of an effective plan.*

#### Documentation of the Planning Process

**Requirement §201.6(b):** *In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:*

- (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
- (2) *An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and*
- (3) *Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.*

**Requirement §201.6(c)(1):** *[The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan provide a narrative description of the process followed to prepare the plan?	Pages 5 & 6	The plan does a very succinct job of detailing the planning process.		X
B. Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pages 5 & 6 Appendix B	Very well done. The tribe invited federal, state and local staff participation. They also invited other tribes to participate and other counties outside the tribal area. Appendix B lists all of the participants and also has copies of the public notices (4).		X
C. Does the plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	Pages 5 & 6 Appendix B	The public was invited and did participate in the planning process. This included ranchers and veterinarians.		X
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Pages 5 & 6	Mineral County, the Fort Peck Tribe, and Blackfeet tribe sent staff members to the meetings. Federal and State agencies participated. The Red Cross attended meetings.		X
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Pages 5 & 6	The tribe has a Comprehensive Resources Plan used to address planning goals and zoning. Mitigation measures are to be integrated into the Resources Plan. Past historical events were researched in disasters, weather, and GIS software was used. Hazard data was compiled from various resources also. Tribal Water Resource and Administration Programs, Housing Authority, Shoreline Protection Board, Safe Dams program, Palmer's Z Index, NOAA, and BIA management of irrigation		X

		networks were all resourced.		
			SUMMARY SCORE	X

**RISK ASSESSMENT:** §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

### Identifying Hazards

**Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
<p>A. Does the plan include a <b>description</b> of the types of <b>all natural hazards</b> that affect the jurisdiction?</p> <p>If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score.</p> <p>Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.</p>	Page 7	<p>Table 3-4 on page 33 highlights all the hazards assessed in the plan.</p> <p>SHELDUS is a data source that provides past hazard event information for 18 types of hazards along with past property damage costs associated with each event. See <a href="http://www.sheldus.org">www.sheldus.org</a>. Data from 01/01/1960 to 12/31/2003 indicates that for Lake County – the primary land mass for the tribe - winter storms, summer storms, and flood are the most frequent and costly hazard events that occur in Lake County. The risk assessment of the plan, based on prior fatalities, property damage, potential economic hardship and future impacts identified three major hazards wildfires, severe winter storms and rain/hail/wind events. The risk assessment in the plan was accomplished in an acceptable manor. SHELDUS data was also collected for the other counties that have land on the reservation. Similar results highlighting winter and summer storms as major events occurred. Including SHELDUS data information in the plan is recommended as the previous occurrences indicated in the plan for some hazards do not go very far back in time.</p> <p>See <a href="http://msc.fema.gov/">http://msc.fema.gov/</a> for a discussion on Principal Flood Problems for the Lake County. Including this information would enhance the plan. Other counties encompassed by the reservation that have principal flood problems documented are Flathead and Missoula Counties.</p>		X



		<p>See <a href="http://crunch.tec.army.mil/nid/webpages/nid.cfm">http://crunch.tec.army.mil/nid/webpages/nid.cfm</a> (introduction and download dam data) for National Dam Inventory information. For the counties encompassed by the tribal lands a total of 9 high hazard dams do not have Emergency Action Plans (EAPs) established. The plan indicates that 15 dams are high hazard on the reservation and that a Safety of Dams (SOD) program has been implemented on the reservation that intends to correct SOD deficiencies at a rate of about "one dam per year". The plan does a good job of discussing dam failure and the existing mitigation program in place to help address this particular risk.</p> <p>Critical scour potential for county bridges is another resource to consider in evaluating potential hazards in the County. HAZUS is source that contains the critical scour potential of bridges by county.</p>		
SUMMARY SCORE				X

## Profiling Hazards

**Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the risk assessment identify the <b>location</b> (i.e., geographic area affected) of each natural hazard addressed in the plan?	Pages 7 - 33	The plans describe the geographical area of each natural hazard. All hazards include a section on Location and Extent of Previous Events, which identifies the location of past occurrences. Maps depicting hazards are included for some hazards, but not all. It would be helpful to include maps of all applicable hazards depicting where in the county hazards have or are likely to occur, noting those areas most severely affected by each hazard. The hazards profile, found on pages 41-50, includes the frequency of the each hazard.		X
B. Does the risk assessment identify the <b>extent</b> (i.e., magnitude or severity) of each hazard addressed in the plan?	Pages 7 - 33	The extent of hazards – the magnitude of past events is highlighted on pages 8-32 in the section titled Location and Extent of Previous Events. The magnitude of each identified hazard is listed in table 3-8.		X
C. Does the plan provide information on <b>previous occurrences</b> of each hazard addressed in the plan?	Pages 7 - 33	Previous occurrences of each type of hazard are addressed in the hazard profiles found on pages 8-32. All hazards include a section on Location and Extent of Previous Events, which identifies and lists past occurrences.		X

		<p><b>Recommended Revisions:</b></p> <p>In the next revision, a table that lists location of hazard, date, time, magnitude, death, injuries, property damage and crop damage would be helpful.</p>		
D. Does the plan include the <b>probability of future events</b> (i.e., chance of occurrence) for each hazard addressed in the plan?	Pages 7 - 33	<p>Probability of future hazard events is described on pages 8-32 under the Vulnerability section for some of the identified hazards and is based upon previous occurrences. Table 3-6 describes the frequency in years for six major hazards and the plan states that this frequency was used to determine the probability of future events.</p> <p><b>Recommended Revisions for the five year update:</b></p> <p>The plan presents good historic information on drought, but does not appear to use past occurrences to estimate probability of future events.</p> <p>Note any data limitations for profiling hazards and include in the mitigation strategy actions for collecting the data to complete and improve future risk analysis efforts, in the next revision of the plan.</p> <p>For more information on profiling hazards, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 2.</p>		X
SUMMARY SCORE				X

## Assessing Vulnerability: Overview

**Requirement §201.6(c)(2)(ii):** *[The risk assessment **shall** include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include an <b>overall summary</b> description of the jurisdiction's <b>vulnerability</b> to each hazard?	Pages 7 - 33	Each hazard profile contains a section on vulnerability, which is related to past occurrences and GIS analysis. Also, map 3-2 depicts total societal vulnerability by census block.  <u><b>Recommendation:</b></u>  For several of the hazards, the data is quite old. For the next revision, ensure that the latest information is documented in the plan. This information could include types of structures or land uses, infrastructure and critical facilities most at risk within each jurisdiction.  For a discussion on vulnerability assessment overview, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a, Inventory Assets.		X
B. Does the plan address the <b>impact</b> of each hazard on the jurisdiction?	Pages 7 - 33	Impacts are well documented, based on the availability of data. Good Job analyzing hazards addressed.		X
SUMMARY SCORE				X

## Assessing Vulnerability: Identifying Structures

**Requirement §201.6(c)(2)(ii)(A):** *The plan **should** describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area ... .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S

<p>A. Does the plan describe vulnerability in terms of the <b>types and numbers</b> of <b>existing</b> buildings, infrastructure, and critical facilities located in the identified hazard areas?</p>	<p>Pages 34-36 Appendix C</p>	<p><b>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</b></p> <p>While the plan provides an extensive list of critical facilities, which is a good start, the planners need to go to the next step – evaluate the structures to specific hazards. Existing critical facilities are listed in the plan, but not by identified hazard areas. In order to receive a satisfactory rating for this requirement, the critical facilities must be identified in association with hazard prone areas.</p> <p><b>Required Revisions:</b></p> <ul style="list-style-type: none"> <li>• For [specify hazard or hazards], identify the type and number of <b>existing</b> buildings, infrastructure, and critical facilities within each hazard area.</li> </ul> <p><b>Additional Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Identify the kinds of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal); infrastructure, (e.g., roadways, bridges, utilities, and communications systems); and critical facilities (e.g., shelters, hospitals, police, and fire stations).</li> <li>• Describe the process or method used for identifying existing buildings, infrastructure, and critical facilities.</li> <li>• If limited data are available, focus on identifying critical facilities located in the identified hazard areas and identify the collection of data for the remaining buildings and infrastructure as an action item in the mitigation strategy.</li> <li>• While not required by the Rule, it is useful to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims. At a minimum, describe repetitive loss neighborhoods or areas in the plan.</li> </ul> <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p>	<p>X</p>	
<p>B. Does the plan describe vulnerability in terms of the <b>types and numbers</b> of <b>future</b> buildings, infrastructure, and critical facilities located in the identified hazard areas?</p>	<p>Page 37</p>	<p><b>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</b></p> <p>The plan discuss that the local officials do not indicate any future buildings, infrastructure or critical facilities that would be located in identified hazard areas, although mitigation options will be</p>	<p>X</p>	

		<p>considered in future land use decisions. However the plan indicates that there are hazards that affect the entire Reservation and the rapid growth described in the plan might benefit from mitigation opportunities, such as earthquake building codes.</p> <p><b>Required Revisions:</b></p> <p>For each hazard identify the type and number of <b>future</b> buildings, infrastructure, and critical facilities within each hazard area so that mitigation options can be considered and supported.</p> <p><b>Additional Suggestions:</b></p> <p>Identify the types of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal buildings), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical facilities (e.g., shelters, hospitals, police, and fire stations).</p> <p>Information on proposed buildings, infrastructure, and critical facilities, including planned and approved development, may be based on information in the comprehensive or land use plan and zoning maps.</p> <p>Identify buildings, infrastructure, and critical facilities that are vulnerable to more than one hazard.</p> <p>Describe the process or method used for identifying future buildings, infrastructure, and critical facilities.</p> <p>Note any data limitations for determining the type and numbers of future buildings, infrastructure, and critical facilities and include in the mitigation strategy actions for collecting the data to improve future vulnerability assessment efforts.</p> <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p>		
		SUMMARY SCORE	X	

## Assessing Vulnerability: Estimating Potential Losses

**Requirement §201.6(c)(2)(ii)(B):** *[The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate ... .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan estimate <b>potential dollar losses</b> to vulnerable structures?	Pages 36, 48, 52	<p><b>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</b></p> <p>Risk calculations that should not be interpreted as actual values but more appropriately used to evaluate the relative risk posed by different hazard types is provided in Table 3-8.</p> <p><b>Required Revisions:</b></p> <ul style="list-style-type: none"> <li>Describe vulnerability in terms of potential dollar losses.</li> </ul> <p><b>Additional Suggestions:</b></p> <ul style="list-style-type: none"> <li>Provide an estimate for each identified hazard.</li> <li>Include, when resources permit, estimates for structure, contents, and function losses to present a full picture of the total loss for each building, infrastructure, and critical facility.</li> <li>Select the most likely event for each identified hazard (e.g., 100-year flood) and estimate the likely losses associated with this event.</li> <li>Include a composite loss map to locate high potential loss areas to help the jurisdiction focus its mitigation priorities.</li> <li>Note any data limitations for estimating losses and include in the mitigation strategy actions for collecting the data to improve future loss estimate efforts.</li> </ul> <p>For a step-by-step method for estimating losses, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 4.</p>	X	
B. Does the plan describe the <b>methodology</b> used to prepare the estimate?	Pages 48 & 51	<p><b>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</b></p> <p>Methodology is provided in the plan. Data limitations, which need to be corrected in the five year update, are identified. The plan does include the methodology used to prepare the estimates. The estimates were prepared based on the building stock data available from FEMA HAZUS software. The plan also discusses data limitations.</p>		X

SUMMARY SCORE

X

## Assessing Vulnerability: Analyzing Development Trends

**Requirement §201.6(c)(2)(ii)(C):** [The plan *should* describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan describe land uses and development trends?	Page 58	<p><b>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</b></p> <p>Page 37 is a discussion on future growth and land use trends. However, specific areas of future development within the tribal lands are not provided. Most of the discussion is about median age of the population, it estimates an increase in population of 12,500 by 2025 and identifies the primary industries of the local economies. In order to receive a satisfactory rating for this requirement, text describing or mapping of specific areas where land use changes and development is likely to occur would be helpful and meet this requirement.</p> <p><b>Required Revisions:</b></p> <ul style="list-style-type: none"> <li>• Provide a general overview of land uses (e.g., location and kind of use).</li> <li>• Describe development trends occurring within the jurisdiction (e.g., describe the types of development occurring, location, expected intensity, and pace by land use).</li> </ul> <p><b>Additional Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Describe existing land use densities in the identified hazard areas.</li> <li>• Describe future land use density. Such information may be obtained from your regional or local planning office, comprehensive plan, or zoning maps. Future development information helps to define appropriate mitigation approaches, and the locations in which these approaches should be applied. This information can also be used reduce development in hazard areas.</li> <li>• Overlay a land use map with identified hazard areas.</li> </ul> <p>Note any data limitations for determining development trends</p>	X	

		and include in the mitigation strategy actions for collecting the data to complete and improve future vulnerability assessment efforts.		
SUMMARY SCORE			X	

## Multi-Jurisdictional Risk Assessment

**Requirement §201.6(c)(2)(iii):** For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Pages 7 – 33	As this is a single jurisdiction, risk assessments are adequately discussed. Additionally, they discussed incorporated jurisdictions, which are being addressed in separate county plans for Lake and Sanders Counties.		X
SUMMARY SCORE				X

**MITIGATION STRATEGY:** §201.6(c)(3): The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.

## Local Hazard Mitigation Goals

**Requirement §201.6(c)(3)(i):** [The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A Does the plan include a description of mitigation <b>goals</b> to reduce or avoid long-term vulnerabilities to the identified hazards? ( <b>GOALS</b> are long-term; represent what the community wants to achieve, such as "eliminate flood damage"; and are based on the risk assessment findings.)	Page 53	<b><u>Marginally met.</u></b>  There are ten goals identified; most are, however, related to Preparedness and Response activities. <b><u>Recommendation:</u></b> For the next revision, focus more on <u>mitigation activities</u> . More information on this can be found in FEMA 386-3.		X
SUMMARY SCORE				X

## Identification and Analysis of Mitigation Actions

**Requirement §201.6(c)(3)(ii):** [The mitigation strategy **shall** include a] section that identifies and analyzes a comprehensive range of specific mitigation



actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan identify and analyze a <b>comprehensive range</b> of specific mitigation actions and projects for each hazard?	Pages 53 – 57 Appendix D	<b>Marginally met:</b> While the plan identifies many different activities that need to be done, they did not address any actions for earthquakes that are identified in the risk assessment. <b>This needs to be addressed in the next update.</b>		X
B. Do the identified actions and projects address reducing the effects of hazards on <b>new</b> buildings and infrastructure?	Pages 37 & 53 – 57 Appendix D	The plan includes projects that address reducing effects of hazards on new buildings, but are limited to education and warning systems.  <b>Recommendation:</b>  Appendix D gives a lot of great ideas for mitigation, developed by a well respect professional. Use those, as appropriate, in the five year update. This should greatly enhance the value of the plan and reduce your risks. Consider incorporating into the mitigation strategy the potential role of land use and building codes in reducing losses to new buildings and infrastructure presented in Appendix D. These measures may be more of the cost effective solutions for the CSKT.		X
C. Do the identified actions and projects address reducing the effects of hazards on <b>existing</b> buildings and infrastructure?	Pages 53 – 57 Appendix D	See above. Also, the plan includes several projects that would protect existing buildings and infrastructure. These projects include moving homeowners out of the flood plain, establishing a buyout program, retrofitting structures and educating the public.		X
SUMMARY SCORE				X

### Implementation of Mitigation Actions

**Requirement: §201.6(c)(3)(iii):** [The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the mitigation strategy include how the actions are <b>prioritized</b> ? (For example, is there a discussion	Pages 54 – 57	The planners used a good matrix to prioritize the projects.		X

of the process and criteria used?)				
B. Does the mitigation strategy address how the actions will be <b>implemented and administered</b> ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Page 57	<b>Marginally met:</b> The tribe has a statement about implementing the projects after plan approval. They need more specifics. <b>Recommendation:</b> Table 4-2 has the basics for implementation. Expand it to show who is responsible, estimated dollar costs, and add a timeframe (1 year, 3 months, etc.). This would add definition and credibility to the plan.		X
C. Does the prioritization process include an emphasis on the use of a <b>cost-benefit review</b> (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i> ) to maximize benefits?	Pages 54 – 57	The plan shows a matrix to indicate cost effectiveness in projects.		X
SUMMARY SCORE				X

## Multi-Jurisdictional Mitigation Actions

**Requirement §201.6(c)(3)(iv):** For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A Does the plan include at least one identifiable <b>action item</b> for each jurisdiction requesting FEMA approval of the plan?	Pages 54 – 57	Action items are listed for various areas of the Reservation.		X
SUMMARY SCORE				X

## PLAN MAINTENANCE PROCESS

## Monitoring, Evaluating, and Updating the Plan

**Requirement §201.6(c)(4)(i):** [The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan describe the method and schedule for <b>monitoring</b> the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Page 58	The plan will be reviewed annually by the TERC/LEPC to update goals and mitigation projects.		X

B. Does the plan describe the method and schedule for <b>evaluating</b> the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)	Page 58	See above. The DES Coordinator will be responsible for making the changes.		X
C. Does the plan describe the method and schedule for <b>updating</b> the plan within the five-year cycle?	Page 58	The DES Coordinator will be responsible for updating the plan and submitting it to the TERC/LEPC. After review, it will be submitted through the SHMO to FEMA for approval.		X
SUMMARY SCORE				X

## Incorporation into Existing Planning Mechanisms

**Requirement §201.6(c)(4)(ii):** *[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Page 58	Implementation will occur through incorporation in to the Confederated Salish and Kootenai Tribes Comprehensive Resource Plan.		X
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Page 58	Local officials will work with the tribal departments to ensure hazard mitigation projects are consistent with planning goals and integrate them, where appropriate. Within six months of the formal adoption of the PDM plan, mitigation goals will be incorporated into the Comprehensive Resource Plan.		X
SUMMARY SCORE				X

## Continued Public Involvement

**Requirement §201.6(c)(4)(iii):** *[The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan explain how <b>continued public participation</b> will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)	Pages 58 & 59	Copies of the plan will be maintained at the Public Library, as well as many of the tribal agencies for review and comment by the public. The DES Coordinator will track those public comments. Additionally, a series of public meetings will be held for the five year update. They will use newspapers and radio to announce meetings.		X
SUMMARY SCORE				X